

FEB 26 2009

FCC Mail Room

23 February 2009

Marlene H. Dortch
Office of the Secretary
Federal Communication Commission
445 12th Street SW
Suite TW-A325
Washington, DC 20554

Dear Ms Dortch

EB Docket No. 06-36
Certification of CPNI Filing

We submitted our filing via email last week and also mailed the original. Please find enclosed four copies of the filing that we inadvertently omitted.

Sincerely



Lorainne Davis
Executive Assistant

Encs

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PACIFIC LIGHTNET

1132 Bishop Street
Suite 800
Honolulu, HI 96813

Received & Inspected
FEB 26 2009
FCC Mail Room

Via ECFS

February 19, 2009

Marlene H. Dortch
Office of the Secretary
Federal Communication Commission
445 12th Street SW
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Washington, DC 20554

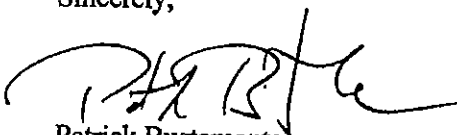
Re: **EB DOCKET NO. 06-36**
CERTIFICATION OF CPNI FILING (February 19, 2009)

Dear Ms. Dortch:

Pacific LightNet, Inc. hereby files a copy of its 2008 Annual CPNI Compliance Certificate, as required by section 64.2009(e) of the Commission's rules.

Please let me know if you have any questions about this filing.

Sincerely,



Patrick Bustamante
President

Cc: Best Copy and Printing, Inc. (BCPI), fcc@bcpiweb.com

**PACIFIC LIGHTNET, INC.
CPNI COMPLIANCE CERTIFICATE
EB Docket No. 06-36**

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I, PATRICK BUSTAMANTE, hereby certify as follows:

1. I am the President of Pacific LightNet, Inc. ("PLNI"). In this capacity, I have personal knowledge of PLNI's operating procedures concerning customer proprietary network information (CPNI).
2. I provide this certification for the calendar year ending December 31, 2008, in accordance with Commission rule 47 C.F.R. 64.2009(e) (together with such other rules contained at 47 C.F.R. 64.2001, et seq, as the same may be modified, amended or clarified, from time to time, collectively, the "CPNI Rules").
3. The attached Statement of CPNI Compliance explains how PLNI's operating procedures ensure that it is in compliance with the CPNI Rules.
4. The Company has not taken any actions against data brokers in the past year.
5. The Company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Certified this 19th day of February, 2009.



PATRICK BUSTAMANTE

ATTACHMENT TO 2008 CPNI COMPLIANCE CERTIFICATE

Statement of CPNI Compliance

PATRICK BUSTAMANTE signs this Statement of CPNI Compliance in accordance with Section 222 of the Telecommunications Act of 1996, as amended, 47 USC 222, and the FCC's Code of Federal Regulations (CFR) Title 47 § 64.2009, on behalf of Pacific LightNet, Inc. (PLNI). This Statement addresses the requirement of 47 CFR § 64.2009 that the Company provide both a Certificate of Compliance and a "statement accompanying the certificate" to explain how its operating procedures ensure compliance with 47 CFR § 64.2001-2009.

On behalf of PLNI, I certify as follows:

1. I am the President of the Company. My business address is 1132 Bishop Street, Suite 800, Honolulu, Hawaii 96813.
2. I have personal knowledge of the facts stated in this Certificate of Compliance. I am responsible for overseeing compliance with the FCC rules relating to customer proprietary network information (CPNI). The Company qualifies as a "small business concern."
3. The Company is conducting ongoing training for its personnel regarding when they are authorized to use CPNI, as well as when they are not authorized to use CPNI. Personnel who make unauthorized use of CPNI are subject to disciplinary action, up to and including termination.
4. During 2008, PLNI did not use, access, or disclose CPNI for the purpose of its sales and marketing campaigns or for services outside the category of services already subscribed to by the customer. In the event PLNI authorizes use of CPNI in any future sales and marketing campaigns, the Company's policy is to maintain records of its own sales and marketing campaigns that use CPNI. These records include a description of each campaign, the specific CPNI that was used in the campaign, and the products and services that were offered as a part of the campaign. The Company's policy is to maintain these records in its offices for a minimum of one year.
5. Prior to any solicitation for customer approval, the Company will provide notification to the customer of the customer's right to restrict use of, disclosure of, and access to that customer's CPNI in accordance with 47 CFR 64.2008. The Company's policy is to maintain records of customer approval for use of CPNI, as well as notices required by the FCC's regulations, for a minimum of one year, in a readily-available location that can be consulted on an as-needed basis so that the status of a customer's CPNI approval can be clearly established prior to the use of CPNI.

6. The Company's policy is to maintain records of a CPNI breach for a minimum of two years. These records will include a description of the steps the Company took to prevent the breach, how the breach occurred, the impact of the breach and proof of notification to law enforcement and the customer, if applicable.
7. During 2008, PLNI did not use, access, or disclose CPNI to conduct outbound marketing. The Company has a supervisory review process regarding compliance with the FCC's rules relating to protection of CPNI for outbound marketing situations. The purpose of this supervisory review process is to ensure compliance with all rules prior to using CPNI for a purpose for which customer approval is required. Company personnel, prior to making any use of CPNI, must first consult with me regarding the lawfulness of using the CPNI in the manner contemplated. In deciding whether the contemplated use of the CPNI is proper, I consult with one or more of the following: the Company's own compliance manual, the applicable FCC regulations, the FCC's Compliance Guide, and, if necessary, legal counsel. The Company's sales personnel must obtain supervisory approval from me regarding any proposed use of CPNI.
8. The Company enters into confidentiality agreements, as necessary, with any joint venture partners or independent contractors to whom it discloses or provides access to CPNI.
9. I personally oversee completing and submitting the EB Docket No. 06-36 compliance certificate.



Patrick Bustamante
President
Pacific LightNet, Inc.
February 19, 2008